

# **EXHIBIT "A"**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**DAKOTA SCOTT WILSON,**

**Plaintiff,**

**v.**

**DONNIE MAC CAMERON and  
TYSON FOODS, INC.,**

**Defendants.**

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**CIVIL NO. 4:17-cv-1573  
JURY**

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**LOCAL RULE 81 EXHIBITS TO DEFENDANTS DONNIE MAC  
CAMERON AND TYSON FOODS, INC.'S NOTICE OF REMOVAL**

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**(1) All executed process in the case;**

- Corporate Citation with corresponding Affidavit of Service – Tyson Foods, Inc.

**(2) Pleadings asserting causes of action and answers to those pleadings;**

- Plaintiff Donnie Mac Cameron's Original Petition and Request for Disclosure to Defendants
- Civil Case Information Sheet
- Defendants Donnie Mac Cameron and Tyson Foods, Inc.'s Original Answers

**(3) All orders signed by the state judge;**

- None

**(4) The docket sheet; and**

- None

**(5) A list of all counsel of record with addresses, telephone numbers, and parties represented;**

- Nhan H. Nguyen  
[nhan@healthlawservices.com](mailto:nhan@healthlawservices.com)  
THE LAW OFFICE OF NHAN NGUYEN  
2500 West Loop South, Suite 340

Houston, Texas 77027  
(713) 840-7200  
(713) 583-4155 (fax)  
*Counsel for Plaintiff Dakota Scott Wilson*

- Zach T. Mayer  
[zmayer@krcl.com](mailto:zmayer@krcl.com)  
Brian J. Fisher  
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J. Edward Johnson  
[ejohnson@krcl.com](mailto:ejohnson@krcl.com)  
KANE RUSSELL COLEMAN LOGAN PC  
1601 Elm Street, Suite 3700  
Dallas, Texas 75201  
(214) 777-4200  
(214) 777-4299 (fax)

*Counsel for Defendants Donnie Mac Cameron and Tyson Foods, Inc.*

**2017-20672**

**COURT:** 269th

**FILED DATE:** 3/27/2017

**CASE TYPE:** Motor Vehicle Accident



**WILSON, DAKOTA SCOTT**

Attorney: NGUYEN, NHAN H

**VS.**

**CAMERON, DONNIE MAC**

Attorney: MAYER, ZACHARY THOMAS

**Docket Sheet Entries**

Docket Sheet Entries	
Date	Comment

CAUSE NO. \_\_\_\_\_

DAKOTA SCOTT WILSON,	§	IN THE DISTRICT COURT OF
	§	
<i>Plaintiff,</i>	§	
	§	
VS.	§	
	§	HARRIS COUNTY, TEXAS
DONNIE MAC CAMERON and	§	
TYSON FOODS, INC.,	§	
	§	
<i>Defendants</i>	§	_____ DISTRICT COURT

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PLAINTIFF’S ORIGINAL PETITION AND  
REQUEST FOR DISCLOSURE TO DEFENDANTS

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TO THE HONORABLE DISTRICT COURT JUDGE:

Plaintiff DAKOTA SCOTT WILSON complains of Defendants DONNIE MAC CAMERON and TYSON FOODS, INC. (collectively, the “Defendants”), and in support would show this Court the following:

LEVEL

1. Plaintiff intends to conduct discovery under Level 2 of Rule 190.3 of the Texas Rules of Civil Procedure and affirmatively pleads that this suit does not fall under the expedited-actions process of Rule 169, because Plaintiff seeks damages in excess of \$100,000.

RELIEF

2. Plaintiff seeks monetary relief over \$200,000 but less than \$1,000,000. Tex. R. Civ. P. 47(c)(4).

PARTIES

3. Plaintiff is a resident of Harris County, Texas.

4. Defendant Donnie Mac Cameron is, upon information and belief, an individual who can be

served with process at his residence address, 10149 North Wedington Blacktop Road, Prairie Grove, Arkansas 72753.

5. Defendant Tyson Foods, Inc. is, upon information and belief, a Delaware corporation that can be served with process by serving its registered agent, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201.

#### VENUE

6. Pursuant to §§15.002 *et seq.* of the Texas Civil Practice and Remedies Code, venue is proper in Harris County, because the cause of action accrued in Harris County, Texas.

#### FACTS

7. This lawsuit results from a collision that occurred in Harris County, Texas. On the afternoon of June 13, 2016, Plaintiff Dakota Scott Wilson (“Plaintiff” or “Wilson”) was traveling eastbound on IH-10 (East Freeway) in Houston, Texas. As Wilson slowed his vehicle due to slowing traffic ahead, suddenly and without any warning, a tractor-trailer driven by Defendant Donnie Mac Cameron (“Cameron”) crashed into the back of Plaintiff’s vehicle, propelling it into the truck traveling in front of him (the “Collision”).

#### NEGLIGENCE

8. Cameron committed acts of omission and/or commission which, collectively and severally, constituted negligence. Cameron’s negligent acts include, but are not limited to, inattention, failure to control speed, failure to timely apply brakes, and failure to obey the traffic laws and signals of the State of Texas.

9. At the time of the Collision, Cameron was acting in the course and scope of his employment with Defendant Tyson Foods, Inc. (“Tyson”) and operating a tractor-trailer owned or leased by Foods. Under the doctrine of *Respondeat Superior*, Tyson is jointly and severally liable for all acts

of Cameron's negligence.

### DAMAGES

10. As a result of Defendants' negligence, Plaintiff sustained damages in an amount within the jurisdictional limits of this Court. Wilson sustained serious injuries in the Collision and is incurring medical expenses for the necessary diagnosis and treatment of his injuries. These charges are reasonable and customary with charges made for such services in the county or counties where they were provided. With reasonable medical probability, Wilson will incur additional medical expenses for the necessary treatment of his injuries in the future. In addition, Wilson has suffered physical pain, mental anguish, and physical impairment resulting from his injuries, and is expected to suffer therefrom in the future.

### PRAYER

Plaintiff DAKOTA SCOTT WILSON prays that DONNIE MAC CAMERON and TYSON FOODS, INC. appear herein, and that upon final trial Plaintiff take a judgment against the Defendants, jointly and severally, for the following:

- (a) Actual damages in an amount within the jurisdictional limit of the court;
- (b) Costs of court;
- (c) Prejudgment and post-judgment interest at the highest lawful rate; and
- (d) Such other and further relief, both general and special, to which Plaintiff may show himself entitled.

### REQUEST FOR DISCLOSURE

Under Rule 194 of the Texas Rules of Civil Procedure, Plaintiff requests that Defendants DONNIE MAC CAMERON and TYSON FOODS, INC. disclose, within fifty (50) days of service, the information and materials described in Rule 194.2.

Respectfully submitted,

THE LAW OFFICE OF NHAN NGUYEN

/s/ Nhan Nguyen

Nhan Nguyen

Texas Bar No. 24041589

2500 West Loop South, Suite 340

Houston, Texas 77027

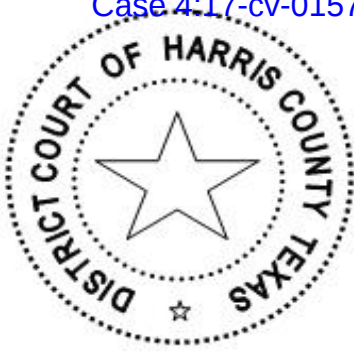
Telephone: 713/840-7200

Telecopier: 713/583-4155

Email: [nhan@healthlawservices.com](mailto:nhan@healthlawservices.com)

ATTORNEYS FOR PLAINTIFF





I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date. Witness my official hand and seal of office this May 16, 2017

Certified Document Number: 74431884 Total Pages: 4

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date. Witness my official hand and seal of office this May 16, 2017

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Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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**CHRIS DANIEL**  
HARRIS COUNTY DISTRICT CLERK

ENTERED  
VERIFIED

**Civil Process Pick-Up Form**

CAUSE NUMBER: 17-20072  
CIV X COURT 269

ATY \_\_\_\_\_

**REQUESTING ATTORNEY/FIRM NOTIFICATION**

\*ATTORNEY: Nguyen, Nhan PH: 713-840-7200  
\*CIVIL PROCESS SERVER: Lene Star Box 17  
\*PH: \_\_\_\_\_  
\*PERSON NOTIFIED SVC READY: \_\_\_\_\_  
\*NOTIFIED BY: \_\_\_\_\_  
DATE: \_\_\_\_\_

Type of Service Document: _____	Tracking Number <u>73369348</u>
Type of Service Document: _____	Tracking Number <u>59339</u>
Type of Service Document: _____	Tracking Number _____
Type of Service Document: <u>CF</u>	Tracking Number _____
Type of Service Document: _____	Tracking Number _____
Type of Service Document: _____	Tracking Number _____
Type of Service Document: _____	Tracking Number _____

Process papers prepared by: **Shanelle Taylor**

Date: 4-5 2017 30 days waiting \_\_\_\_\_

*Process papers released to:	<u>R. H. Gulkin</u> (PRINT NAME)
*(CONTACT NUMBER)	<u>713-840-7200</u> (SIGNATURE)
*Process papers released by:	<u>Shanelle Taylor</u> (PRINT NAME)
	<u>Shanelle Taylor</u> (SIGNATURE)
* Date: <u>4/11</u> , 2017	Time: <u>8:25</u> AM / PM



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office  
this May 16, 2017

Certified Document Number: 74666331 Total Pages: 1

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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RECEIPT NUMBER 0.00  
TRACKING NUMBER 73359339 CIVCAUSE NUMBER 201720672PLAINTIFF: WILSON, DAKOTA SCOTT  
vs.  
DEFENDANT: CAMERON, DONNIE MACIn The 269th  
Judicial District Court of  
Harris County, Texas

## CITATION CORPORATE

THE STATE OF TEXAS  
County of HarrisTO: TYSON FOODS INC (DELAWARE CORPORATION) BY SERVING ITS REGISTERED AGENT  
CT CORPORATION SYSTEM  
1999 BRYAN STREET SUITE 900 DALLAS TX 75201Attached is a copy of PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE.This instrument was filed on the 27th day of March, 2017, in the  
above cited cause number and court. The instrument attached describes the claim against you.**YOU HAVE BEEN SUED;** you may employ an attorney. If you or your attorney do not file a written answer with the  
District Clerk who issued this citation by 10:00 a.m on the Monday next following the expiration of 20 days after you were  
served this citation and petition, a default judgment may be taken against you.

## TO OFFICER SERVING:

This Citation was issued under my hand and seal of said Court, at Houston, Texas, this 5th day of  
April, 2017.Issued at request of:  
NGUYEN, NHAN H  
2500 WEST LOOP SOUTH, SUITE  
340  
HOUSTON, TX 77027  
TEL: (713) 840-7200  
Bar Number: 24041589Chris Daniel  
CHRIS DANIEL, District Clerk  
Harris County, Texas  
201 Caroline, Houston, Texas 77002  
P.O.Box 4651, Houston, Texas 77210

Generated by: TAYLOR, SHANELLE L 3VT//10645133

## OFFICER/AUTHORIZED PERSON RETURN

I received this citation on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_M., endorsed  
the date of delivery thereon, and executed it at \_\_\_\_\_  
(STREET ADDRESS) (CITY)  
in \_\_\_\_\_ County, Texas on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_M.,  
by delivering to \_\_\_\_\_  
(THE DEFENDANT CORPORATION NAMED IN CITATION)\_\_\_\_\_, in person, whose name is \_\_\_\_\_  
(REGISTERED AGENT, PRESIDENT, or VICE-PRESIDENT)  
a true copy of this citation, with a copy of the \_\_\_\_\_  
(DESCRIPTION OF PETITION, IF IT IS NOT AN ORIGINAL)  
and with accompanying copies of \_\_\_\_\_  
(ADDITIONAL DOCUMENTS, IF ANY, DELIVERED WITH THE CITATION)**AFFIDAVIT  
ATTACHED**

I certify that the facts stated in this return are true by my signature below on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

FEE: \$ 50By: \_\_\_\_\_  
(SIGNATURE OF OFFICER)

Printed Name: \_\_\_\_\_

Affiant Other Than Officer

As Deputy for: \_\_\_\_\_  
(PRINTED NAME & TITLE OF SHERIFF OR CONSTABLE)On this day, \_\_\_\_\_, known to me to be the person whose signature  
appears on the foregoing return, personally appeared. After being by me duly sworn, he/she stated that this citation was  
executed by him/her in the exact manner recited on the return.

SWORN TO AND SUBSCRIBED BEFORE ME, on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_

\_\_\_\_\_  
Notary Public

CAUSE NO. 2017-20672

DAKOTA SCOTT WILSON

Plaintiff,

VS.

DONNIE MAC CAMERON, ET AL

Defendant.

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IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

269TH JUDICIAL DISTRICT

AFFIDAVIT OF SERVICE - CERTIFIED MAIL

On this day personally appeared **ANDREW C. MANGER** who, being by me duly sworn, deposed and said:

"The following came to hand on Apr 11, 2017, 4:39 pm,

**CITATION CORPORATE, PLAINTIFF'S ORIGINAL PETITION, REQUEST FOR DISCLOSURE,**

and was executed on **Mon, Apr 24 2017** by mailing to **TYSON FOODS INC C/O CT CORPORATION SYSTEM** at **1999 BRYAN STREET, SUITE 900, DALLAS, TX 75201. DALLAS COUNTY**, by Certified Mail, Return Receipt Requested, Receipt No. **7016 1370 0001 4577 5927**, a true copy of this citation together with the accompanying pleadings.

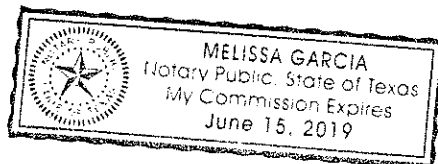
I am a person over eighteen (18) years of age and I am competent to make this affidavit. I am a resident of the State of Texas. I am familiar with the Texas Rules of Civil Procedure as they apply to service of Process. I am not a party to this suit nor related or affiliated with any herein, and have no interest in the outcome of the suit. I have never been convicted of a felony or of a misdemeanor involving moral turpitude. I have personal knowledge of the facts stated herein and they are true and correct."

  
\_\_\_\_\_  
ANDREW C. MANGER, SCH# 821, EXP: 7/31/2017

**BEFORE ME**, a Notary Public, on this day personally appeared **ANDREW C. MANGER**, known to me to be the person whose name is subscribed to the foregoing document and, being by me first duly sworn, declared that the statements therein contained are within his or her personal knowledge and are true and correct.

SUBSCRIBED AND SWORN TO ME ON 4/28/17

  
\_\_\_\_\_  
Notary Public, State of Texas





## CAUSE NO. 2017-20672

DAKOTA SCOTT WILSON

Plaintiff,

VS.

DONNIE MAC CAMERON, ET AL

Defendant.

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IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

269TH JUDICIAL DISTRICT

AFFIDAVIT OF SERVICE - CERTIFIED MAIL

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**CERTIFIED MAIL® RECEIPT**  
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**DALLAS, TX 75201**

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Extra Services & Fees (check box, add fee as appropriate)	\$2.75
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage \$0.70

Total Postage and Fees \$6.80

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 City, State, ZIP+4®

TYSON FOODS INC C/O  
 CT CORPORATION SYSTEM  
 1999 BRYAN STREET, SUITE 900  
 DALLAS, TX 75201

PS Form 3800, A See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p>TYSON FOODS INC C/O          CT CORPORATION SYSTEM          1999 BRYAN STREET, SUITE 900          DALLAS, TX 75201</p> <p>2. Article Number (Transfer from service label)</p> <p>7016 1370 0001 4577 5927</p>	<p>A. Signature</p> <p>X </p> <p><input type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name)          Chris Wells</p> <p>C. Date of Delivery          APR 24 2017</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes          If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature  <input type="checkbox"/> Adult Signature Restricted Delivery  <input checked="" type="checkbox"/> Certified Mail®  <input type="checkbox"/> Certified Mail Restricted Delivery  <input type="checkbox"/> Collect on Delivery  <input type="checkbox"/> Collect on Delivery Restricted Delivery</p> <p><input type="checkbox"/> Priority Mail Express®  <input type="checkbox"/> Registered Mail™  <input type="checkbox"/> Registered Mail Restricted Delivery  <input type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Signature Confirmation™  <input type="checkbox"/> Signature Confirmation Restricted Delivery</p>

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date. Witness my official hand and seal of office this May 16, 2017

Certified Document Number: 74885779 Total Pages: 3

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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KANE RUSSELL COLEMAN &amp; LOGAN PC

ZACH T. MAYER  
Direct Dial: (214) 777-4271  
Email: [zmayer@krcl.com](mailto:zmayer@krcl.com)

May 11, 2017

Via eFileTexas.gov (filing and service)

Via Email: [nhan@healthlawservices.com](mailto:nhan@healthlawservices.com)

Nhan H. Nguyen

THE LAW OFFICE OF NHAN NGUYEN

2500 West Loop South, Suite 340

Houston, Texas 77027

Re: ***Dakota Wilson v. Donnie Mac Cameron and Tyson Foods, Inc.***

Cause No.: 2017-20672

Court: 269<sup>th</sup> Judicial District Court of Harris County, Texas

Our File No.: 58140.00154.000

Dear Counsel:

Attached please find ***Defendants Donnie Mac Cameron and Tyson Foods, Inc.'s Original Answer*** in the above-referenced matter, which was e-filed today in the 269<sup>th</sup> Judicial District Court, Harris County, Texas.

*Please provide dates that your client is available for his deposition.*

In case you have any questions or require additional information, please do not hesitate to contact Brian Fisher at 214.777.4240 or [bfisher@krcl.com](mailto:bfisher@krcl.com) and Andrew J. Mihalick at 713.425.7400 or [amihalick@krcl.com](mailto:amihalick@krcl.com). Thank you for your cooperation and assistance in this matter.

Very truly yours,

KANE RUSSELL COLEMAN &amp; LOGAN PC

By: 

Zach T. Mayer

ZTM/smp  
Attachments

5244237 v1 (58140.00154.000)



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date. Witness my official hand and seal of office this May 16, 2017

Certified Document Number: 75054941 Total Pages: 1

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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**CAUSE NO. 2017-20672**

<b>DAKOTA SCOTT WILSON,</b>	§	<b>IN THE DISTRICT COURT OF</b>
<i>Plaintiff,</i>	§	
	§	
<b>v.</b>	§	<b>HARRIS COUNTY, TEXAS</b>
	§	
<b>DONNIE MAC CAMERON and</b>	§	
<b>TYSON FOODS, INC.,</b>	§	
<i>Defendants.</i>	§	<b>269<sup>TH</sup> JUDICIAL DISTRICT</b>

**DEFENDANTS DONNIE MAC CAMERON AND  
TYSON FOODS, INC.'S ORIGINAL ANSWER**

Defendants, Donnie Mac Cameron ("Cameron") and Tyson Foods, Inc. ("Tyson"),  
(collectively, "Defendants"), file their Original Answer and state the following:

**I.**

**GENERAL DENIAL**

1. Defendants deny each and every, all and singular, the material allegations contained within the Original Petition filed by Plaintiff, Dakota Scott Wilson ("Plaintiff" or "Wilson"), and demand strict proof thereof.

**II.**

**AFFIRMATIVE DEFENSES**

2. Pleading further, alternatively, and by way of affirmative defense, Defendants assert that any damages sought to be recovered by Plaintiff should be reduced to the extent that Plaintiff has failed to take the reasonable steps that a person of ordinary prudence in a similar situation would have taken to avoid the claimed damages.

3. Pleading further, alternatively, and by way of affirmative defense, Defendants

assert that in the unlikely event that an adverse judgment would be rendered against them, Defendants would respectfully request all available credits and/or offsets as provided by the Texas Civil Practice and Remedies Code and under Texas law.

4. Pleading further, alternatively, and by way of affirmative defense, Defendants assert that Plaintiff engaged in acts, including acts of negligence, which caused Plaintiff's damages. Therefore, Plaintiff is barred, in whole or in part, from a recovery of damages from Tyson.

5. Pleading further, alternatively, and by way of affirmative defense, Defendants assert that other parties may have caused the Plaintiff's injuries. If such is established, Defendants' liability must be reduced accordingly, and if Defendants are found to be jointly and severally liable, Defendants are entitled to a judgment for contribution from other Defendants.

6. Pleading further, alternatively, and by way of affirmative defense, Defendants assert that Plaintiff's damages, if any, were solely caused by the conduct of other parties or, alternatively, that the conduct of other parties was an intervening cause of Plaintiff's claimed damages. Therefore, Defendants are not liable for such damages.

7. Pleading further, alternatively, and by way of affirmative defense, Defendants assert that Plaintiff assumed the risk associated with engaging in the activity associated with the incident made the basis of this lawsuit. Plaintiff should therefore be barred from recovery of damages against Defendants.

8. Pleading further, alternatively, and by way of affirmative defense, Defendants assert that in addition to any other limitation under law, Plaintiff's recovery of medical or health care expenses be limited to the amount actually paid or incurred by or on behalf of Plaintiff,

pursuant to Section 41.0105 of the Texas Civil Practices and Remedies Code.

9. Defendants hereby give notice that they intend to rely upon such other defenses or denials, affirmative or otherwise, and to assert third-party claims and any other claims, as may become available or appear during discovery as it proceeds in this matter, and hereby reserve the right to amend their Answer to assert such defenses.

### **III.**

#### **JURY DEMAND**

10. In accordance with Rule 216 of the Texas Rules of Civil Procedure, Defendants demands a trial by jury.

### **IV.**

#### **PRAYER**

11. Defendants Donnie Mac Cameron and Tyson Foods, Inc. pray that Plaintiff take nothing by this suit, that Defendants go hence with their costs without delay, and for such other and further relief, both general and special, at law and in equity, to which Defendants may show themselves justly entitled.

Respectfully submitted,

**KANE RUSSELL COLEMAN LOGAN PC**

By: /s/ Zach T. Mayer  
Zach T. Mayer  
State Bar No. 24013118  
[zmayer@krcl.com](mailto:zmayer@krcl.com)  
Brian J. Fisher  
State Bar No. 24032178  
[bfisher@krcl.com](mailto:bfisher@krcl.com)

1601 Elm Street, Suite 3700  
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Facsimile: 214.777.4299

Andrew J. Mihalick  
State Bar No. 24046439  
[amihalick@krcl.com](mailto:amihalick@krcl.com)

Galleria Tower II  
5051 Westheimer Road, 10<sup>th</sup> Floor  
Houston, Texas 77056  
Telephone: 713.425.7400  
Facsimile: 713.425.7700

**ATTORNEYS FOR DEFENDANTS DONNIE  
MAC WILSON AND TYSON FOODS, INC.**



**CERTIFICATE OF SERVICE**

This is to certify that on the 11<sup>th</sup> day of May, 2017, a true and correct copy of the foregoing has been forwarded as follows:

**Via eFileTexas.gov (filing and service)**

**Via Email: [nhan@healthlawservices.com](mailto:nhan@healthlawservices.com)**

Nhan H. Nguyen

THE LAW OFFICE OF NHAN NGUYEN

2500 West Loop South, Suite 340

Houston, Texas 77027

/s/ Zach T. Mayer

Zach T. Mayer



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date. Witness my official hand and seal of office this May 16, 2017

Certified Document Number: 75054940 Total Pages: 5

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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